

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHRISTOPHER DAVID BAILEY

Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE
Movant

CASE NO: 1-23-01031-HWV

vs.

CHRISTOPHER DAVID BAILEY

Respondent(s)

TRUSTEE'S MOTION TO DISMISS CASE

AND NOW, on January 18, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney Douglas R. Roeder, Esquire, and respectfully represents the following:

1. An Amended Plan was filed on July 31, 2023.
2. A hearing was held and an Order was entered on November 29, 2023 directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire
Id: 80016
Attorney for Movant
Jack N. Zaharopoulos
Standing Chapter 13 Trustee
Suite A, 8125 Adams Drive
Hummelstown, PA 17036
Phone: 717-566-6097
email: droeder@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHRISTOPHER DAVID BAILEY

Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-23-01031-HWV

CHRISTOPHER DAVID BAILEY

Respondent(s)

NOTICE

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Sylvia H. Rambo United States Courthouse
Bankruptcy Courtroom 4B
1501 North 6th Street
Harrisburg, PA 17102

Date: February 28, 2024

Time: 09:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Date: January 18, 2024

/s/ Douglas R. Roeder, Esquire

Id: 80016

Attorney for Trustee

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Suite A, 8125 Adams Dr.

Hummelstown, PA 17036

Phone: (717) 566-6097

email: info@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHRISTOPHER DAVID BAILEY

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-23-01031-HWV

vs.

CHRISTOPHER DAVID BAILEY

Respondent(s)

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on January 18, 2024, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

Served electronically

MICHAEL A CIBIK, ESQUIRE
CIBIK LAW, PC
1500 WALNUT ST, SUITE 900
PHILADELPHIA, PA 19102

UNITED STATES TRUSTEE
1501 NORTH 6TH STREET
BOX 302
HARRISBURG, PA 17102

Served by 1st Class Mail

CHRISTOPHER DAVID BAILEY
18 N FRANKLIN ST
WAYNESBORO, PA 17268-1208

I certify under penalty of perjury that the foregoing is true and correct.

Date: January 18, 2024

/s/ Vickie Williams

Office of Standing Chapter 13 Trustee

Jack N. Zaharopoulos

Suite A, 8125 Adams Dr.

Hummelstown, PA 17036

Phone: (717) 566-6097

email: info@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHRISTOPHER DAVID BAILEY

Debtor(s)

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE

Movant

CHAPTER 13

CHRISTOPHER DAVID BAILEY

Respondent(s)

CASE NO: 1-23-01031-HWV

ORDER DISMISSING CASE

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.